

Thornton Davidson #166487  
THORNTON DAVIDSON, P.C.  
1195 W. Shaw Ave., Suite A  
Fresno, California 93711  
Tel: (559) 476-5064  
Fax: (559) 421-0368  
E-mail: thornton@thorntondavidsonlaw.com

Attorneys for Plaintiffs

**UNITED STATES DISTRICT COURT**  
**FOR THE EASTERN DISTRICT OF CALIFORNIA**

\* \* \* \* \*

AKAL BROADCASTING CORP., a  
California corporation; XL MEDIA (CA),  
INC., a California corporation; AKAL  
MEDIA, INC., a Washington corporation;  
CHARANJIT S. BATTH, an individual;  
NACHHATAR S. DHALIWAL, an  
individual; BALRAJ S. BRAR, an individual;  
NAZAR S. KOONER, an individual,

Plaintiffs,

vs.

SUKHDEV SINGH DHILLON, a Canadian  
citizen; MOHAN S CHEEMA; TARNVIR S  
BISLA; JAGDEEP S DHALIWAL; BAAZ  
BROADCASTING CORP., a Washington  
corporation; RADIO PUNJAB, INC., a  
California corporation; AMAR  
BROADCASTING INC., a Washington  
corporation; TEG BROADCASTING INC., a  
Washington corporation; RADIO SPICE USA  
INC., a California corporation; and DOES 1-50,

Defendants.

Case No.: 1:24-CV-00029-SAB

**INTERIM STIPULATION RE:  
INJUNCTIVE RELIEF; ORDER**

STIPULATION RE: INJUNCTIVE RELIEF; ORDER THEREON

1 This Stipulation re: Injunctive Relief is entered into by Plaintiffs AKAL BROADCASTING  
2 CORP., a California corporation; XL MEDIA (CA), INC., a California corporation; AKAL  
3 MEDIA, INC., a Washington corporation; CHARANJIT S. BATTH, an individual;  
4 NACHHATAR S. DHALIWAL, an individual; BALRAJ S. BRAR, an individual; NAZAR S.  
5 KOONER, an individual (“Plaintiffs”) and Defendants Sukhdev Singh Dhillon, BAAZ  
6 BROADCASTING CORP., a Washington corporation; RADIO PUNJAB, INC., a California  
7 corporation; AMAR BROADCASTING INC., a Washington corporation; TEG BROADCASTING  
8 INC., a Washington corporation; RADIO SPICE USA INC., a California corporation  
9 (“Defendants”), and their agents, servants, employees, investors, officers and all persons and  
10 entities in active concert and participation with them (collectively, the “Associated Parties”).

11 The parties stipulate that Defendants and Associated Parties agree to completely and  
12 permanently refrain from the following actions beginning 15 days after the date of this Stipulation  
13 until otherwise stipulated in writing by the Parties or ordered by the Court:

- 14 1. Using the Radio Punjab mark (or any other mark(s) confusingly similar thereto) for, on,  
15 and/or in connection with over-the-air radio broadcasting in the Fresno, Bakersfield, and  
16 Seattle radio markets. This prohibition will apply to broadcasting on KGST Fresno,  
17 KWAC Bakersfield, KNTS Seattle, KOKO-FM Fresno, and any other stations to be  
18 licensed or programmed or otherwise operated by any of the Defendants or their  
19 Associated Parties in the future in Fresno, Bakersfield, and Seattle.
- 20 2. Using the Radio Punjab mark (or any other mark(s) confusingly similar thereto), including  
21 the Radio Punjab logo, in any manner in the Fresno, Bakersfield, and Seattle radio  
22 markets, including any mention on KGST Fresno, KWAC Bakersfield, KNTS Seattle,  
23 KOKO-FM, and any other radio station operated by any of the Defendants or their  
24 associated Parties in the future in Fresno, Bakersfield, and Seattle, on any website  
25 advertising or promoting itself as “Radio Punjab,” including but not limited to Defendants’  
26 website; radiopunjab.ca; and any use of the Radio Punjab logo in any advertising or  
27 promotion for Defendants’ competing stations, such as on vehicles or other promotional  
28 material.

- 1 3. Plaintiffs and Defendants agree not to disparage each other, their respective entities, radio  
2 stations, and/or investors, in any manner which does or tends to diminish the reputation,  
3 quality, or commercial viability of said persons or enterprises.
- 4 4. Using, on the airwaves in the Fresno, Bakersfield and Seattle radio markets, the same  
5 “jingle” previously used for Radio Punjab which states: “This is the Radio Punjab, it goes  
6 with you everywhere, when you’re in the store, in the house, on the highway, this is the  
7 Radio Punjab.” This prohibition includes using the same jingle with a substitute name such  
8 as Spice Radio. In effect, they must use a completely new “jingle” with different words.
- 9 5. Using the Radio Punjab mark (or any other mark(s) confusingly similar thereto) to solicit  
10 advertising from, enter into agreements with, and/or otherwise promote their identity with  
11 advertisers for KGST Fresno, KWAC Bakersfield, KNTS Seattle, KOKO-FM Fresno and  
12 any other stations to be licensed or programmed or otherwise operated by any of the  
13 Defendants or their Associated Parties in the future in Fresno, Bakersfield, or Seattle.
- 14 6. Disparaging any of Plaintiffs’ radio stations through any broadcasting medium at any time,  
15 or intentionally attempting to confuse listeners and advertisers about Plaintiffs’ radio  
16 stations’ identity as Radio Punjab in Fresno, Bakersfield, and Seattle.

17  
18 Plaintiffs:

19 AKAL BROADCASTING CORP.,  
20 a California corporation

XL MEDIA (CA), INC.,  
a California corporation

21 \_\_\_\_\_  
Authorized Signer

22 Name: \_\_\_\_\_

\_\_\_\_\_

Authorized Signer  
Name: \_\_\_\_\_

AKAL MEDIA, INC.,  
a Washington corporation

Authorized Signer  
Name: \_\_\_\_\_

CHARANJIT S. BATTH

NACHHATAR S. DHALIWAL

BALRAJ S. BRAR

NAZAR S. KOONER

Defendants:

BAAZ BROADCASTING CORP.,  
a Washington corporation

SUKHDEV SINGH DHILLON

Authorized Signer  
Name: \_\_\_\_\_

RADIO PUNJAB, INC.,  
a California corporation

AMAR BROADCASTING, INC.,  
a Washington corporation

Authorized Signer  
Name: \_\_\_\_\_

Authorized Signer  
Name: \_\_\_\_\_

TEG BROADCASTING INC.,  
a Washington corporation

RADIO SPICE USA INC.,  
a California corporation

Authorized Signer  
Name: \_\_\_\_\_

Authorized Signer  
Name: \_\_\_\_\_

IT SO ORDERED, ADJUDGED, AND DECREED.

IT IS SO ORDERED.

Dated: April 17, 2024

  
UNITED STATES DISTRICT JUDGE